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U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

BY hc

UNDER SEAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

October 2007 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JERRY FANYUAN LIN,
JASON I. MING WEI,
REN SUI,

a.k.a. "Jeffrey,"

ERIK DAMIEN VICENTE,
JOSE G. GARIBAY,

a.k.a. "Guero,"

SHANE KELTER,
ADRIAN GARCIA DE ALBA,

a.k.a. "Pedro,"

JAGMOHAN S. DHILLON,
PARAMIJT SINGH,

a.k.a. "Pumma,"

WALTHER EDGARDO ORELLANA
AGUILAR,

a.k.a. "Sharky,"

FAUSTO VILLA PEREZ,
MING CHIEN HSIEH,

a.k.a. "Sonny,"

HONG YEE CHOW,

a.k.a. "Annie,"

MARCO ANTONIO SILVA MOTA,
ALEXANDER CHIANG POU,

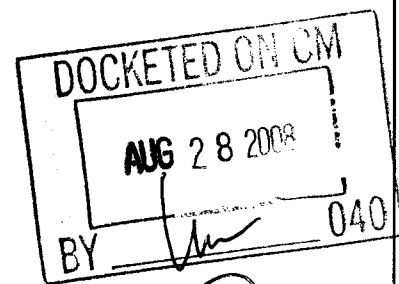
a.k.a. "Alex,"

SA CR 08-

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy
to Distribute and Possess with
Intent to Distribute; 21
U.S.C. § 841(a): Possession
with Intent to Distribute 3,4-
Methylenedioxymethamphetamine;
21 U.S.C. § 841(a): Possession
with Intent to Distribute
Methamphetamine; 21 U.S.C. §
841(a): Possession with Intent
to Distribute Cocaine; 18
U.S.C. § 1956(a)(3)(A):
Laundering of Monetary
Instruments]

SACR 08-223



3

1 NATHANAEL GARRARD LINEHAM,)
a.k.a. "Nat,")
2 MICHELLE ENCK,)
Defendants.)
3 _____)
4

5 The Grand Jury charges:

6 COUNT ONE

7 [21 U.S.C. § 846]

8 I. OBJECTS OF THE CONSPIRACY

9 1. Beginning on or about a date unknown to the Grand Jury,
10 but at least since April 2006, and continuing to on or about
11 August 27, 2008, in Orange, Los Angeles, Riverside, and San
12 Bernardino Counties, within the Central District of California,
13 and elsewhere, defendants JERRY FANYUAN LIN, JASON I. MING WEI,
14 REN SUI, also known as ("a.k.a.") "Jeffrey," ERIK DAMIEN VICENTE,
15 JOSE G. GARIBAY, a.k.a. "Guero," SHANE KELTER, ADRIAN GARCIA DE
16 ALBA, a.k.a "Pedro," JAGMOHAN S. DHILLON, PARAMIJT SINGH, a.k.a.
17 "Pumma," WALTHER EDGARDO ORELLANA AGUILAR, a.k.a. "Sharky,"
18 FAUSTO VILLA PEREZ, MING CHIEN HSIEH, a.k.a. "Sonny," HONG YEE
19 CHOW, a.k.a. "Annie," MARCO ANTONIO SILVA MOTA, ALEXANDER CHIANG
20 POU, a.k.a. "Alex," NATHANAEL GARRARD LINEHAM, a.k.a. "Nat,"
21 MICHELLE ENCK, and others known and unknown, aiding and abetting
22 each other, did conspire and agree with each other to knowingly
23 and intentionally distribute and possess with intent to
24 distribute a mixture or substance containing a detectable amount
25 of 3,4-methylenedioxymethamphetamine (also known as "MDMA"), a
26 schedule I controlled substance, more than 5 kilograms of a
27 mixture or substance containing a detectable amount of cocaine, a
28 Schedule II controlled substance, and more than 500 grams of a

1 mixture or substance containing a detectable amount of
2 methamphetamine, a Schedule II controlled substance, all in
3 violation of Title 21, United States Code, Section 841(a)(1).

4 II. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
5 ACCOMPLISHED

6 2. The objects of the conspiracy were to be accomplished
7 in substance as follows:

8 a. Defendant LIN would obtain MDMA and cocaine from
9 defendant WEI. Defendant LIN would use the proceeds from the
10 sale of MDMA and cocaine to further his narcotics activities in
11 the United States through the purchase and resale of
12 methamphetamine and other controlled substances.

13 b. Defendant WEI would oversee the importation of
14 MDMA into the United States from Canada and would oversee the
15 trafficking of kilogram quantities of cocaine to Canada from the
16 United States.

17 c. Defendant KELTER would direct defendant WEI's
18 activities related to the trafficking of narcotics to or from
19 Canada and the laundering of narcotics proceeds.

20 d. Defendants HSIEH and CHOW would distribute,
21 transport, and move narcotics in the United States at defendant
22 LIN's direction.

23 e. Defendants SUI and POU would purchase narcotics
24 from defendant LIN to further distribute the narcotics in the
25 United States.

26 f. Defendant VICENTE would supply methamphetamine to
27 defendant LIN in the United States.

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1 g. Defendants GARIBAY and MOTA would supply
2 methamphetamine to defendant VICENTE in the United States.

3 h. Defendant SINGH would assist in coordinating the
4 distribution and transportation of narcotics, specifically
5 cocaine, from the United States to Canada for defendant WEI and
6 others.

7 i. Defendants AGUILAR, DHILLON, and PEREZ would
8 distribute, transport, and move narcotics, specifically cocaine,
9 for defendant WEI and others.

10 j. Defendant DE ALBA would supply narcotics to
11 defendant WEI and others.

12 k. Defendant LINEHAM would use his position with Data
13 Locking, a.k.a. BeStealth, to market encrypted Blackberry
14 electronic devices to narcotics traffickers in order to thwart
15 law enforcement detection.

16 l. Defendant LINEHAM would direct defendant ENCK and
17 other individuals to distribute these encrypted devices on his
18 behalf to narcotics traffickers, such as defendants WEI, AGUILAR,
19 and DE ALBA, so that they could avoid law enforcement detection.

20 III. OVERT ACTS

21 3. In furtherance of the conspiracy and to accomplish the
22 objects of the conspiracy, on or about the following dates,
23 defendants LIN, WEI, SUI, VICENTE, GARIBAY, KELTER, DE ALBA,
24 DHILLON, SINGH, AGUILAR, PEREZ, HSIEH, CHOW, MOTA, POU, LINEHAM,
25 ENCK, and others known and unknown, committed various overt acts
26 within the Central District of California and elsewhere,
27 including but not limited to, the following:

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1 A. September 8, 2006 Distribution of 2,000 MDMA Tablets

2 4. On or about September 6, 2006, a confidential source
3 ("CS") had a recorded telephone call with defendant LIN to set up
4 a meeting to discuss a narcotics transaction.

5 5. On or about September 6, 2006, defendant LIN met with
6 the CS. Defendant LIN told the CS that he would supply
7 approximately 2,000 MDMA pills to defendant SUI directly. The CS
8 told defendant LIN that defendant SUI would call defendant LIN on
9 September 8, 2006 to arrange the deal.

10 6. On or about September 8, 2006, defendant LIN had
11 several recorded telephone conversations with the CS in which
12 they discussed the sale of MDMA for later that day.

13 7. On or about September 8, 2006, defendant SUI had
14 several recorded telephone conversations with the CS regarding
15 the sale of MDMA.

16 8. On or about September 8, 2006, defendant LIN placed a
17 telephone call to defendant WEI to discuss obtaining the MDMA.

18 9. On or about September 8, 2006, defendant LIN went to
19 defendant WEI's residence in downtown Los Angeles to pick up the
20 MDMA.

21 10. On or about September 8, 2006, defendant LIN met with
22 defendant SUI and provided him with approximately 2,000 tablets
23 of MDMA.

24 11. On or about September 8, 2006, defendant SUI sold the
25 approximately 2,000 MDMA tablets that he had obtained from
26 defendant LIN to an undercover agent of the Federal Bureau of
27 Investigation ("UC").

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1 B. September 20, 2006 Distribution of 1,000 MDMA Tablets

2 12. On or about September 19, 2006, defendant LIN contacted
3 the CS to inform the CS that defendant SUI had ordered 1,000 MDMA
4 tablets from defendant LIN and that defendant LIN was going to
5 arrange to deliver the 1,000 MDMA tablets to defendant SUI the
6 next day.

7 13. On or about September 20, 2006, defendant LIN provided
8 defendant SUI with approximately 1,000 MDMA tablets.

9 14. On or about September 20, 2006, defendant SUI sold the
10 approximately 1,000 MDMA tablets that he had obtained from
11 defendant LIN to the UC.

12 C. November 8, 2006 Distribution of Methamphetamine

13 15. On or about November 4, 2006, defendant LIN had a
14 recorded telephone conversation with defendant SUI in which they
15 discussed defendant LIN providing defendant SUI with a pound of
16 "ice" (methamphetamine).

17 16. From on or about November 4, 2006 to November 6,
18 2006, defendant LIN and defendant SUI had several recorded
19 telephone calls regarding arranging the methamphetamine
20 transaction for November 8, 2006.

21 17. On or about November 7, 2006, defendant LIN had several
22 recorded telephone conversations with defendant VICENTE regarding
23 obtaining methamphetamine for two deals defendant LIN had
24 scheduled for the week.

25 18. On or about November 8, 2006, defendant LIN called
26 defendant HSIEH and told defendant HSIEH that he needed to obtain
27 the money owed to defendant LIN from the sale of other narcotics
28 in order to purchase the methamphetamine to sell to defendant

1 SUI. Defendant LIN and defendant HSIEH also discussed the prices
2 that defendant LIN was going to pay defendant VICENTE for the
3 methamphetamine.

4 19. On or about November 8, 2006, defendant LIN and
5 defendant SUI had several recorded telephone conversations in
6 which they discussed the price and sale of one pound of
7 methamphetamine for later that evening.

8 20. On or about November 8, 2006, defendant LIN and
9 defendant HSIEH had several recorded telephone conversations
10 regarding obtaining methamphetamine from defendant VICENTE.
11 Defendant LIN agreed to pay defendant HSIEH \$1,000 after the deal
12 for defendant HSIEH's role in the transaction and defendant LIN
13 also instructed defendant HSIEH to meet with defendant VICENTE to
14 pay for the methamphetamine.

15 21. On or about November 8, 2006, defendant LIN had several
16 recorded telephone conversations with defendant VICENTE in which
17 they discussed defendant LIN obtaining methamphetamine from
18 defendant VICENTE that night.

19 22. On or about November 8, 2006, defendant SUI met with
20 the UC in defendant SUI's car at a gas station in Rowland
21 Heights, California, and defendant SUI informed the UC that
22 defendant SUI was still waiting for defendant LIN to obtain the
23 one pound of methamphetamine.

24 23. On or about November 8, 2006, defendant LIN had a
25 recorded telephone conversation with the UC, who was still with
26 defendant SUI, in which defendant LIN stated that he would be
27 able to provide the methamphetamine in about an hour.

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1 24. On or about November 8, 2006, defendant SUI took \$5,000
2 from the UC so that defendant LIN could obtain the pound of
3 methamphetamine. Defendant SUI agreed that the UC would provide
4 the remaining \$7,000 once the UC received the pound of
5 methamphetamine.

6 25. On or about November 8, 2006, defendant SUI gave the
7 \$5,000 to defendant LIN who was parked in another vehicle at the
8 gas station.

9 26. On or about November 8, 2006, defendant LIN gave a half
10 pound of methamphetamine to defendant SUI.

11 27. On or about November 8, 2006, defendant SUI gave the
12 half pound of methamphetamine to the UC and informed the UC that
13 defendant LIN had obtained only a half pound of "ice"
14 (methamphetamine). The UC then provided defendant SUI with an
15 additional \$1,000.

16 D. November 10, 2006 Distribution of Methamphetamine

17 28. On or about November 9, 2006, defendant LIN and
18 defendant SUI had several recorded telephone conversations in
19 which they discussed how much methamphetamine defendant SUI
20 needed to provide to his buyer, the UC. Defendant LIN agreed to
21 provide a half pound of methamphetamine to defendant SUI so that
22 he could complete the deal with the UC.

23 29. On or about November 9, 2006, defendant LIN had several
24 recorded telephone calls with defendant VICENTE regarding
25 defendant LIN obtaining a half pound of methamphetamine from
26 defendant VICENTE.

27 30. On or about November 9, 2006, defendant LIN obtained a
28 half pound of methamphetamine from defendant VICENTE.

1 31. On or about November 9, 2006, defendant LIN and
2 defendant VICENTE had several recorded telephone conversations in
3 which defendant LIN complained about the quality of the
4 methamphetamine.

5 32. On or about November 10, 2006, defendant LIN provided
6 defendant SUI with a half pound of methamphetamine.

7 33. On or about November 10, 2006, defendant SUI sold the
8 UC a half pound of methamphetamine.

9 E. November 15, 2006 Distribution of Methamphetamine

10 34. On or about November 14, 2006, defendant LIN had
11 several recorded telephone calls with defendant VICENTE regarding
12 defendant LIN obtaining a distributable quantity of
13 methamphetamine from defendant VICENTE.

14 35. On or about November 15, 2006, defendant LIN and
15 defendant VICENTE met and defendant VICENTE provided defendant
16 LIN with a distributable quantity of methamphetamine.

17 36. On or about November 15, 2006, defendant LIN and
18 defendant VICENTE had several recorded telephone conversations in
19 which defendant LIN complained about the quality of the
20 methamphetamine and defendant VICENTE assured defendant LIN that
21 the "new batch" would be of better quality.

22 F. November-December 2006 Agreement Regarding MDMA Distribution

23 37. On or about November 6, 2006, defendant LIN had a
24 recorded telephone call with defendant POU in which defendant POU
25 inquired as to whether defendant LIN had any MDMA to sell
26 defendant POU.

27 38. On or about November 19, 2006, defendant LIN had a
28 recorded telephone call with defendant POU in which defendant POU

1 agreed to buy approximately five (5) "boats" (5,000 tablets) of
2 MDMA per week if defendant LIN lowered his sale price.

3 39. On or about December 5, 2006, defendant LIN had a
4 recorded telephone call with defendant POU in which defendant POU
5 explained to defendant LIN that he was willing to buy five (5)
6 "boats" (5,000 tablets) of MDMA per week from defendant LIN if
7 defendant LIN again lowered his sale price.

8 40. On or about December 6, 2006, defendant LIN had a
9 recorded telephone call with defendant POU in which defendant LIN
10 stated that he would lower his sale price per MDMA tablet if
11 defendant POU agreed to purchase 10,000 tablets.

12 G. January 2007 Distribution of Methamphetamine

13 41. On or about January 7, 2007, defendant VICENTE
14 and defendant GARIBAY had a recorded telephone conversation in
15 which defendant VICENTE informed defendant GARIBAY that he needed
16 to pick up a quarter pound of methamphetamine and that it needed
17 to be of good quality because it was for defendant LIN.
18 Defendant GARIBAY informed defendant VICENTE that there was not
19 any good quality methamphetamine at this time.

20 42. On or about January 7, 2007, defendant VICENTE
21 and defendant GARIBAY had a recorded telephone conversation in
22 which defendant GARIBAY asked defendant VICENTE if he had gotten
23 any methamphetamine. Defendant VICENTE confirmed that he was
24 picking some up that night.

25 43. On or about January 8, 2007, defendant VICENTE gave
26 defendant LIN a quarter pound of methamphetamine.

27 44. On or about January 8, 2007, defendant VICENTE and
28 defendant LIN had a recorded telephone conversation in which

1 defendant LIN complained about defendant VICENTE providing bad
2 quality methamphetamine. Defendant VICENTE and defendant LIN
3 agreed that defendant VICENTE would get better quality
4 methamphetamine and exchange it for the quarter pound of
5 methamphetamine that defendant LIN was already given.

6 45. On or about January 8, 2007, defendant VICENTE and
7 defendant GARIBAY had a recorded telephone conversation in which
8 defendant GARIBAY informed defendant VICENTE that he had good
9 quality methamphetamine that would be ready for defendant VICENTE
10 to pick up the next day.

11 46. On or about January 9, 2007, defendant VICENTE and
12 defendant GARIBAY had several recorded telephone conversations
13 coordinating the pick up and delivery of the higher quality
14 methamphetamine.

15 H. January 10, 2007 Transfer of Drug Proceeds

16 47. On or about January 10, 2007, defendant WEI met with
17 defendant DE ALBA and gave defendant DE ALBA a suitcase
18 containing approximately \$179,860 in U.S. currency as payment for
19 narcotics previously supplied to defendant WEI.

20 48. On or about January 10, 2007, defendant DE ALBA
21 possessed approximately \$179,860 in U.S. currency representing
22 narcotics proceeds.

23 I. January 16, 2007 Transfer of Drug Proceeds

24 49. On or about January 16, 2007, a courier delivered
25 approximately \$200,000 in U.S. currency representing narcotics
26 proceeds to defendant WEI.

27 50. On or about January 16, 2007, defendant WEI possessed
28 approximately \$600,000 in U.S. currency representing narcotics

1 proceeds.

2 J. February 8, 2007 Distribution of Methamphetamine

3 51. On or about February 8, 2007, defendant CHOW and
4 defendant VICENTE had several recorded telephone conversations
5 regarding defendant CHOW obtaining a half pound of
6 methamphetamine from defendant VICENTE.

7 52. On or about February 8, 2007, defendant VICENTE and
8 defendant GARIBAY had several recorded telephone conversations
9 regarding defendant GARIBAY supplying defendant VICENTE with a
10 half pound of methamphetamine.

11 53. On or about February 8, 2007, defendant LIN met with
12 the UC in Orange County, California in order for defendant LIN to
13 provide the UC with a half pound of methamphetamine. Defendant
14 LIN informed the UC that they would have to travel to Los Angeles
15 County to meet with the supplier of the methamphetamine.

16 54. On or about February 8, 2007, defendant LIN met with
17 the UC in San Gabriel, California and the UC provided LIN with
18 \$4,200 in cash to purchase the methamphetamine. Defendant LIN in
19 turn provided the cash to defendant CHOW who took the money to
20 obtain the methamphetamine.

21 55. On or about February 8, 2007, defendant CHOW met with
22 defendant VICENTE and obtained a half pound of methamphetamine.

23 56. On or about February 8, 2007, defendant CHOW returned
24 to the location where defendant LIN and the UC were waiting and
25 provided defendant LIN with the methamphetamine.

26 57. On or about February 8, 2007, defendant LIN provided
27 the UC with a half pound of methamphetamine and the UC gave
28 defendant LIN an additional \$3,000 to pay for it.

1 K. March 2007 Negotiations Regarding MDMA and Cocaine

2 58. On or about March 14, 2007, defendant LIN met with
3 the UC in Arcadia, California and provided the UC with two MDMA
4 tablets as samples. Defendant LIN and the UC then negotiated the
5 price at which defendant LIN would sell the MDMA to the UC.

6 59. On or about March 14, 2007, defendant LIN, during the
7 meeting with the UC in Arcadia, California, also provided the UC
8 with a sample of cocaine. Defendant LIN told the UC that his
9 supplier for the cocaine was defendant WEI.

10 L. April 5, 2007 Methamphetamine Distribution

11 60. On or about April 4, 2007, defendant VICENTE had
12 several recorded telephone conversations with defendant MOTA
13 regarding defendant VICENTE obtaining approximately a half pound
14 of methamphetamine from defendant MOTA.

15 61. On or about April 5, 2007, defendant VICENTE had
16 several recorded telephone conversations with defendant MOTA
17 regarding defendant VICENTE picking up approximately a half pound
18 of methamphetamine from defendant MOTA.

19 62. On or about April 5, 2007, defendant VICENTE met with
20 defendant MOTA and defendant VICENTE obtained a half pound of
21 methamphetamine from defendant MOTA.

22 M. April and May 2007 Negotiations Regarding Cocaine

23 63. On or about April 20, 2007, defendant WEI met with
24 the CS and informed the CS that he was a cocaine and MDMA
25 distributor and that he supplied defendant LIN with cocaine and
26 MDMA.

27 64. On or about April 20, 2007, defendant WEI informed the
28 CS that he could provide cocaine to the CS if they were to do

1 business together, but that the CS would need to order at least
2 five (5) kilograms of cocaine at a time.

3 65. On or about May 17, 2007, defendant WEI told the CS
4 that he used to pay \$10,000 per kilogram of cocaine wholesale,
5 but that his price has been raised to \$16,500 per kilogram of
6 cocaine wholesale. Defendant WEI admitted that he got a better
7 price because he orders 50 to 100 kilograms of cocaine at a time.

8 N. May 2007 Methamphetamine Distribution

9 66. On or about May 21, 2007, defendant VICENTE and
10 defendant MOTA had a recorded telephone conversation in which
11 defendant VICENTE discussed obtaining methamphetamine from
12 another source, but informed defendant MOTA that he would call
13 defendant MOTA if his other source could not come through.

14 67. On or about May 21, 2007, defendant VICENTE had a
15 recorded telephone conversation with defendant MOTA in which
16 defendant MOTA informed defendant VICENTE that he could obtain
17 high quality methamphetamine if defendant VICENTE was interested.
18 Defendant VICENTE informed defendant MOTA that he would call
19 later.

20 68. On or about May 22, 2007, defendant VICENTE had a
21 recorded telephone conversation with defendant MOTA in which
22 defendant VICENTE informed defendant MOTA that he had to check
23 with "the Chinese people" to see if they wanted the high quality
24 methamphetamine that defendant MOTA had obtained.

25 O. June 19, 2007 Transportation of Cocaine to Canada

26 69. From on or about June 15, 2007, to on or about June
27 18, 2007, defendant WEI had several recorded telephone
28 conversations with defendant SINGH regarding defendant SINGH

1 sending defendant DHILLON to pick up cocaine from defendant WEI
2 in Los Angeles County to transport to Canada.

3 70. On or about June 19, 2007, defendant WEI had a recorded
4 telephone conversation with defendant SINGH in which defendant
5 SINGH informed defendant WEI that he would have defendant DHILLON
6 contact defendant WEI regarding the pick up of cocaine.

7 71. On or about June 19, 2007, defendant WEI had several
8 recorded telephone conversations with defendant DHILLON regarding
9 the pick up of cocaine. Defendant DHILLON explained to defendant
10 WEI that he was driving a tractor-trailer so that defendant WEI
11 could load the cocaine. Defendant WEI told defendant DHILLON
12 that he had 33 kilograms of cocaine, but that he needed to push
13 back the pick up time because defendant WEI had to pick up a few
14 more kilograms to total 45 kilograms.

15 72. On or about June 19, 2007, defendant WEI met with
16 defendant DHILLON at a warehouse in Carson, California to load
17 the approximately 45 kilograms of cocaine into the tractor-
18 trailer.

19 73. On or about June 19, 2007, defendant WEI had a recorded
20 telephone conversation with defendant SINGH in which defendant
21 WEI confirmed that he gave defendant DHILLON 45 kilograms of
22 cocaine.

23 P. June-July Transportation of 35 Kilograms of Cocaine to
24 Canada

25 74. On or about June 26, 2007, defendant SINGH had a
26 recorded telephone conversation with a confidential source
27 ("CS2") regarding defendant SINGH hiring CS2 to drive a tractor-
28 trailer loaded with cocaine from Los Angeles County to Canada.

1 75. From on or about June 28, 2007, to on or about July 1,
2 2007, defendant SINGH had several recorded telephone
3 conversations with CS2 regarding the logistics of CS2 picking up
4 the cocaine in Los Angeles County.

5 76. On or about July 1, 2007, defendant SINGH had a
6 recorded telephone conversation with CS2 in which defendant SINGH
7 gave CS2 the telephone number of the person to get in contact
8 with to pick up the cocaine and defendant SINGH provided CS2 with
9 a code to tell the contact person in order to be able to obtain
10 the cocaine.

11 77. On or about July 1, 2007, defendant PEREZ loaded
12 approximately 35 kilograms of cocaine into a vehicle driven by
13 CS2.

14 Q. Use of Encrypted Blackberries to Thwart Law Enforcement
15 Detection

16 78. On or about June 28, 2007, defendant WEI had several
17 recorded telephone conversations with defendant ENCK regarding
18 defendant WEI obtaining an encrypted Blackberry device provided
19 by defendant LINEHAM.

20 79. On or about June 28, 2007, defendant WEI met with
21 defendant ENCK who provided defendant WEI, at the direction of
22 defendant LINEHAM, with an encrypted Blackberry device.

23 R. August 2007 Attempted Distribution of 80 Kilograms of
24 Cocaine

25 80. On or about August 18, 2007, defendant WEI had several
26 recorded telephone conversations with defendant AGUILAR regarding
27 meeting that day in order for defendant WEI to provide defendant
28 AGUILAR with approximately ten kilograms of cocaine.

1 81. On or about August 18, 2007, defendant WEI provided
2 approximately ten kilograms of cocaine to defendant AGUILAR.

3 82. On or about August 20, 2007, defendant WEI obtained
4 approximately \$200,000 in U.S. currency from an undercover agent
5 ("UC2") that represented the proceeds from the sale of narcotics.

6 83. On or about August 20, 2007, shortly after defendant
7 WEI obtained the \$200,000, defendant WEI had a recorded telephone
8 call with defendant KELTER in which defendant WEI expressed
9 concern that he was being followed by law enforcement so he
10 abandoned his vehicle with the money in it. Defendant KELTER
11 attempted to reassure defendant WEI that the individuals who
12 provided the money to defendant WEI were not law enforcement and
13 that defendant WEI needed to go back and get the money.

14 84. From on or about August 20, 2007, to on or about August
15 21, 2007, defendant WEI had several recorded telephone
16 conversations with defendant KELTER in which defendant WEI
17 continued to express concern that law enforcement had detected
18 him. Defendant KELTER and defendant WEI discussed the need to
19 clean out the stash pad and defendant KELTER told defendant WEI
20 that he would contact defendant AGUILAR to take care of it.

21 85. On or about August 21, 2007, defendant WEI had a
22 recorded telephone conversation with defendant AGUILAR in which
23 defendant WEI sent defendant AGUILAR to his stash pad to ensure
24 that the 80 kilograms of cocaine that was contained in his stash
25 pad were removed to avoid law enforcement detection.

26 86. On or about August 21, 2007, defendant AGUILAR went to
27 the stash pad to ensure that there was no cocaine located there.

28 ///

1 S. Distribution of Encrypted Blackberry Devices to Thwart Law
2 Enforcement Detection

3 87. On or about December 14, 2007, defendant LINEHAM had a
4 recorded telephone conversation with defendant ENCK in which
5 defendant LINEHAM checked on the status of the Blackberry orders
6 to narcotic traffickers that defendant ENCK was handling on his
7 behalf.

8 88. On or about January 6, 2008, defendant WEI had a
9 recorded telephone conversation with defendant ENCK in which
10 defendant WEI inquired as to how to "kill" his encrypted
11 Blackberry device in order to avoid law enforcement detection.

12 89. On or about January 8, 2008, defendant LINEHAM had a
13 recorded telephone conversation with defendant ENCK in which they
14 discussed the distribution of Blackberries to narcotic
15 traffickers.

16 90. On or about January 22, 2008, defendant LINEHAM had a
17 recorded telephone conversation with defendant ENCK in which they
18 discussed the distribution of Blackberries to narcotic
19 traffickers.

COUNT TWO

[21 U.S.C. § 841(a)(1); 18 U.S.C. § 2]

On or about September 8, 2006, in Los Angeles County, within the Central District of California, defendants JERRY FANYUAN LIN, JASON I. MING WEI, and REN SUI, a.k.a. "Jeffrey," aiding and abetting each other, did knowingly and intentionally possess with intent to distribute approximately 564.7 grams of a mixture or substance containing a detectable amount of 3,4-methylenedioxymethamphetamine (also known as "MDMA"), a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

[21 U.S.C. § 841(a)(1); 18 U.S.C. § 2]

On or about September 20, 2006, in Los Angeles County, within the Central District of California, defendants JERRY FANYUAN LIN and REN SUI, a.k.a. "Jeffrey," aiding and abetting each other, did knowingly and intentionally possess with intent to distribute approximately 274.2 grams of a mixture or substance containing a detectable amount of 3,4-methylenedioxymethamphetamine (also known as "MDMA"), a schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

[21 U.S.C. § 841(a)(1); 18 U.S.C. § 2]

On or about November 8, 2006, in Los Angeles County, within the Central District of California, defendants JERRY FANYUAN LIN, REN SUI, a.k.a. "Jeffrey," ERIK DAMIEN VICENTE, and MING CHIEN HSIEH, a.k.a. "Sonny," aiding and abetting each other, did knowingly and intentionally possess with intent to distribute more than 50 grams of methamphetamine, approximately 98.8 grams, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

[21 U.S.C. § 841(a)(1); 18 U.S.C. § 2]

On or about November 10, 2006, in Los Angeles County, within the Central District of California, defendants JERRY FANYUAN LIN, REN SUI, a.k.a. "Jeffrey," and ERIK DAMIEN VICENTE, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute more than 50 grams of methamphetamine, approximately 93.6 grams, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

[21 U.S.C. § 841(a)(1); 18 U.S.C. § 2]

On or about February 8, 2007, in Orange and Los Angeles Counties, within the Central District of California, defendants JERRY FANYUAN LIN, ERIK DAMIEN VICENTE, JOSE G. GARIBAY, and HONG YEE CHOW, a.k.a. "Annie," aiding and abetting each other, did knowingly and intentionally possess with intent to distribute more than 50 grams of methamphetamine, approximately 145.7 grams, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

[21 U.S.C. § 841(a)(1); 18 U.S.C. § 2]

On or about July 1, 2007, in Los Angeles and Riverside Counties, within the Central District of California, defendants FAUSTO VILLA PEREZ and PARAMIJT SINGH, aiding and abetting each other, did knowingly and intentionally possess with intent to distribute more than 5 kilograms, approximately 35 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

[18 U.S.C. § 1956(a)(3)(A)]

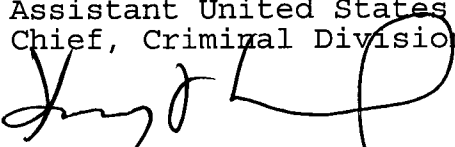
On or about February 8, 2007, in Orange and Los Angeles Counties, within the Central District of California, defendant JERRY FANYUAN LIN intending to promote the carrying on of specified unlawful activity, that is, felonious narcotics trafficking, knowingly and willfully conducted a financial transaction affecting interstate or foreign commerce involving property represented by a law enforcement officer to be (a) the proceeds of felonious narcotics trafficking and (b) property used to conduct or facilitate felonious narcotics trafficking, in that defendant LIN sold to an undercover law enforcement officer for \$7,200.00 cash approximately 145.7 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

A TRUE BILL

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Foreperson

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